

1 Luis A. Carrillo, Esq. (SBN 70398)  
2 *Lac4justice@gmail.com*  
3 Michael S. Carrillo, Esq. (SBN 258878)  
4 *mc@carrillofirm.com*  
5 **CARRILLO LAW FIRM, LLP**  
6 1499 Huntington Dr., Ste. 402  
7 South Pasadena, CA 91030  
8 Telephone: 626-799-9375

5 Dale K. Galipo, Esq. (SBN 144074)  
6 *dalekgalipo@yahoo.com*  
7 **LAW OFFICES OF DALE K. GALIPO**  
8 21800 Burbank Blvd., Suite 310  
9 Woodland Hills, CA 91367  
10 Telephone: (818)347-3333

9 Attorneys for Plaintiff

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 MARGARITO T. LOPEZ individually  
13 and as successor in interest to  
14 Margarito E. Lopez, Deceased; SONIA  
15 TORRES, KENI LOPEZ, and ROSY  
16 LOPEZ, individually,

16 Plaintiffs,

17 vs.

18 CITY OF LOS ANGELES; JOSE  
19 ZAVALA; JULIO QUINTANILLA;  
20 and DOES 1-10, inclusive,

21 Defendants.  
22  
23  
24  
25  
26  
27  
28

**Case No.: 2:22-cv-07534-FLA-MAAx**  
Hon. Judge Fernando L. Aenlle-Rocha,  
Hon. Mag. Maria A. Audero

**PLAINTIFFS' PROPOSED VOIR  
DIRE**

FPTC: May 31, 2024  
Trial: July 16, 2024

1 **TO THE HONORABLE COURT AND TO ALL PARTIES HEREIN:**

2 **PLEASE TAKE NOTICE THAT** Plaintiffs hereby submit their [Proposed]  
3 Voir Dire Questions.

4  
5 Respectfully submitted,

6  
7 DATED: May 17, 2024

LAW OFFICES OF DALE K. GALIPO

8  
9 By /s/ Dale K. Galipo

10 Dale K. Galipo  
11 Renee V. Masongsong  
12 Shannon J. Leap  
13 Attorneys for Plaintiffs  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS**

2 Plaintiffs hereby respectfully request the Court to ask the jury panel the  
3 following proposed voir dire questions as set forth below:

4 **Questions re: Drug Bias**

5 *Plaintiffs request that this Court voir dire the jury on drug bias only in the*  
6 *event that the Court denies Plaintiffs' motion in limine on that issue (No. 1).*

- 7 1. Do you have any feelings, thoughts, or preconceptions about people who use  
8 drugs?
- 9 2. Do you think it would be difficult to be fair to both sides if you heard  
10 evidence that one of the parties had used drugs?
- 11 3. Do you have any particular knowledge or information regarding the effects of  
12 drugs on a person?
- 13 4. If you heard evidence that one of the parties had used drugs, do you think that  
14 you could still find that the officers' conduct was unreasonable?
- 15 5. Do you have any feelings, one way or another, about whether a person who  
16 uses drugs deserves the same protection from excessive force by police  
17 officers as everyone else?

18 **Questions re: Criminal History**

19 *Plaintiffs request that this Court voir dire the jury on criminal history only in*  
20 *the event that the Court denies Plaintiffs' motion in limine on that issue (No. 1).*

- 21 6. Do you know anyone who has ever been arrested?
- 22 7. Do you have any feelings, thoughts, or preconceptions about people who have  
23 been arrested?

24 **Questions re: Peace Officer Bias**

- 25 8. Would you be more likely to believe a police officer's testimony over the  
26 testimony of a non-police officer?
- 27 9. Do you think a police officer who is a defendant in a civil case is capable of  
28 testifying falsely under oath?

1 10. Do you think that a police officer is capable of testifying falsely under oath to  
2 support a fellow officer?

3 11. Are you or any of your family members or close friends current or former  
4 government employees or police officers? If yes, what agency and what type  
5 of job?

6 12. Are you or any of your family members or close friends current or former  
7 service members in any division or branch of our military? If yes, what  
8 division or branch and what type of job?

9 13. Are you or is anyone you know a current or former police officer? If yes,  
10 who, what agency, and how long?

11 14. Have you or has anyone you know attended or applied to attend any law  
12 enforcement academy or basic training?

13 15. Have you applied to or are you a member of any branch of the armed forces?

14 16. Have you or anyone you know worked as or applied to work as a firefighter,  
15 paramedic, or other type of emergency response personnel?

16 17. Does anyone feel that police officers have been unfairly portrayed in the  
17 media with respect to the use of force?

18 **Questions re: Juror Connection to Defendants**

19 18. Have you, a family member, or any of your close friends had any contact or  
20 association with the City of Los Angeles Police Department, or any of their  
21 employees? If so, please describe the circumstances of the contact or  
22 association.

23 a) If so, would you view the evidence in this case differently  
24 because of your past experience with the San Bernardino County  
25 Sheriffs, or any of their employees?

26 19. Are you or is anyone you know a current or former employee of the City of  
27 Los Angeles Police Department? If so:

28 a) Who do you know?

- 1 b) What is or was their job?  
2 c) How long were they employed?  
3 d) Would you view the evidence in this case differently because of  
4 your past experience with the City of Los Angeles Police  
5 Department, or any of their employees?

6 **Questions re: Justiciability of Peace Officer Conduct**

- 7 20. Do you think that our society should hold police officers liable in court when  
8 they violate an individual's constitutional rights?  
9 21. Do you agree that police officers or the entity they work for should pay  
10 money damages when they violate an individual's constitutional rights?  
11 22. Do you think that police officers should be able to use as much force as they  
12 want when arresting someone?  
13 23. Do you think that our society should restrict the amount of force that police  
14 officers can use?

15 **Questions re: General Juror Bias & Bias Against Actions for Money Damages**

- 16 24. Do you think that because the defendants are denying responsibility for this  
17 incident, they are probably not responsible?  
18 25. Is there anybody that would hold it against the plaintiffs simply because they  
19 have pursued this case to trial?  
20

21 DATED: May 17, 2024

CARRILLO LAW FIRM, LLP  
LAW OFFICES OF DALE K. GALIPO

22  
23  
24 By: /s/ Dale K. Galipo

Luis A. Carrillo  
Michael S. Carrillo  
Dale K. Galipo  
Attorneys for Plaintiffs